



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL

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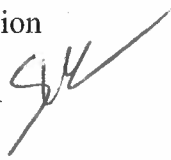
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January 30, 2019

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TO: CELIA ZAVALA
Executive Officer
Board of Supervisors

Attention: Agenda Preparation

FROM: STEVEN H. ESTABROOK 
Litigation Cost Manager
Executive Office

RE: **Item for the Board of Supervisors' Agenda**
County Claims Board Recommendation
Rachel Roberts v. County of Los Angeles, et al.,
Los Angeles Superior Court Case No. BC 628 672

Attached is the Agenda entry for the Los Angeles County Claims Board's recommendation regarding the above-referenced matter. Also attached are the Case Summary and Summary Corrective Action Plan to be made available to the public.

It is requested that this recommendation, the Case Summary, and Summary Corrective Action Plan be placed on the Board of Supervisors' agenda.

SHE:scr

Attachment

Board Agenda

MISCELLANEOUS COMMUNICATIONS

Los Angeles County Claims Board's recommendation: Authorize settlement of the matter entitled Rachel Roberts v. County of Los Angeles, et al., Los Angeles Superior Court Case No. BC 628 672 in the amount of \$225,000 and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Sheriff's Department's budget.

This lawsuit arises from alleged injuries sustained in a vehicle accident involving a Sheriff's Department employee.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Rachel Roberts v. County of Los Angeles, et. al..
CASE NUMBER	BC 628672
COURT	Los Angeles Superior Court
DATE FILED	July 28, 2016
COUNTY DEPARTMENT	Sheriff's Department
PROPOSED SETTLEMENT AMOUNT	\$ \$225,000
ATTORNEY FOR PLAINTIFF	Mindy Bish, Esq.
COUNTY COUNSEL ATTORNEY	Adrian G. Gragas Principal Deputy County Counsel
NATURE OF CASE	This lawsuit arises from a vehicle collision that occurred on September 1, 2015, between Sheriff's Department civilian employee Sonya Gore and Plaintiff Rachel Roberts. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 31,443
PAID COSTS, TO DATE	\$ 11,319

Case Name:

Rachel Roberts V. County of Los Angeles

County of Los Angeles

Summary Corrective Action Plan

Summary Corrective Action Plan



The intent of this form is to assist departments in writing a corrective action plan summary for attachment to the settlement documents developed for the Board of Supervisors and/or the County of Los Angeles Claims Board. The summary should be a specific overview of the claims/lawsuits' identified root causes and corrective actions (status, time frame, and responsible party). This summary does not replace the Corrective Action Plan form. If there is a question related to confidentiality, please consult County Counsel.

Date of incident/event:	September 1, 2015
Briefly provide a description of the incident/event:	<ul style="list-style-type: none">On Tuesday, September 1, 2015 at approximately 12:15 P.M., an employee assigned to Medical Services Bureau (MSB) was driving a Los Angeles County Sheriff's Department (LASD), 2000 Ford E-350, Cargo Van in the City of Long Beach.While driving eastbound in the east-west alley, west of Walnut Avenue, and south of 5th street, in the City of Long Beach, the employee arrived at the intersection of the alley and Walnut Avenue. The employee planned on making a left turn on Walnut Avenue and continue to travel northbound. The employee reported she looked in both directions and did not see any cars coming in either direction on Walnut Avenue. She began to make her left turn onto Walnut Avenue and at the last minute she reported seeing a vehicle coming southbound on Walnut Avenue and simultaneously collided with that oncoming vehicle.

Case Name: Rachel Roberts V. County of Los Angeles

County of Los Angeles
Summary Corrective Action Plan

1 Briefly describe the root cause(s) of the claim/lawsuit:

The primary **Department** root cause in this incident was the failure of a Department member to yield to oncoming traffic before entering traffic.

2. Briefly describe recommended corrective actions:
(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

Traffic Collision Investigation/Administrative Action

- As a result of this incident, Supervisors from Medical Services Bureau conducted an Investigation and presented their findings to Department executives for adjudication.

Results of Investigation

- Employee violated California Vehicle Code section 21804 (a).

Administrative Action

- Proper administrative action has been taken.

Responsible person: Assistant Sheriff Kelly Harrington

Case Name:

Rachel Roberts V. County of Los Angeles

County of Los Angeles

Summary Corrective Action Plan

Name: (Risk Management Coordinator)
Commander Cheryl Newman-Tarwater

Signature:




Date:

11/2

Name: (Department Head)
Chief Christy Guyovich

Signature:

APRICE DANIEL DYER


Date:

11/2

Chief Executive Office Risk Management Inspector General USE ONLY

Are the corrective actions applicable to other departments within the County?



Yes, the corrective actions potentially have County-wide applicability.



No, the corrective actions are applicable only to this department.

Name: (Risk Management Inspector General)
CEO Destiny Castro

Signature:



Date:

11/27/18